

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Robert & Kristin DiBiasio

Debtor

Case No.: 18-13378AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, by and through their undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. After confirmation of the Debtor's Plan, Debtors requested that pre-petition real estate taxes be added to their Plan to assist in a more complete reorganization.
2. Debtor's Counsel contacted Counsel for Delaware County, and their proof of claim has subsequently been amended.
3. Debtors are in need of a modified Plan to address these arrears.
4. The Debtors by and through their Counsel have drafted a proposed modified plan to address this. Please see attached proposed modified plan marked as "**Exhibit A**" and incorporated herein.
5. This modified Chapter 13 Plan is feasible and will allow the Debtors to complete their Chapter 13 Bankruptcy.

WHEREFORE, the Debtors request that she be permitted to modify their Chapter 13 Plan for the above stated reasons.

Dated: May 2, 2019

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtors